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Attorneys for Plaintiffs  
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 Fleischer, and Jacqueline Fleischer

**UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA**

TC RICH, LLC, a California Limited  
 Liability Company, RIFLE FREIGHT,  
 INC., a California corporation,  
 FLEISCHER CUSTOMS BROKERS, a  
 sole proprietorship, RICHARD G.  
 FLEISCHER, an individual, and  
 JACQUELINE FLEISCHER, an  
 individual,

Plaintiffs,

v.

PACIFICA CHEMICAL,  
 INCORPORATED, a California  
 corporation, AQUA SCIENCE  
 ENGINEERS, INC., a California  
 Corporation, A/E WEST  
 CONSULTANTS, INC., a Nevada  
 Corporation, and DOES 1 through 10,  
 inclusive,

Defendants.

Case No. CV 15-4878 DMG (AGRx)

*Assigned to the Hon. Dolly M. Gee*

**ELEVENTH FURTHER JOINT  
 QUARTERLY STATUS REPORT  
 AS ORDERED BY THE COURT**

Action filed: June 26, 2015  
 Discovery: Stayed  
 Trial date: None set

Submitted on August 14, 2020

1 Plaintiffs TC RICH, LLC, a California limited liability company, RIFLE  
 2 FREIGHT, INC., a California corporation, FLEISCHER CUSTOMS BROKERS, a  
 3 sole proprietorship, RICHARD G. FLEISCHER, an individual, and JACQUELINE  
 4 FLEISCHER, an individual, and defendant PACIFICA CHEMICAL  
 5 INCORPORATED, and Plaintiff-Intervenor (collectively, the “Parties”) submit this  
 6 Eleventh Further Joint Status Report.

7 The ten prior joint reports were filed on:

- 8 1. January 19, 2018 (Dkt. 91);
- 9 2. October 19, 2018 [Dkt. 96];
- 10 3. November 14, 2018 [Dkt. 98];
- 11 4. February 7, 2019 [Dkt. 100];
- 12 5. February 28, 2019 [Dkt. 103];
- 13 6. May 14, 2019 [Dkt. 117];
- 14 7. August 14, 2019 [Dkt. 118];
- 15 8. November 14, 2019 [Dkt. 119];
- 16 9. February 14, 2020 [Dkt. 121]; and
- 17 10. May 14, 2020 [Dkt. 125].

18 The Parties reported in the 10<sup>th</sup> Quarterly Report that “[t]he environmental  
 19 consultant performed the second quarter sampling event and is working on the pilot  
 20 test report.” Due to delays, in part attributable to the inability to complete timely  
 21 field work due to COVID-19 work restrictions, that pilot test report is being drafted  
 22 and should be ready in mid-September rather than the anticipated delivery date in  
 23 the Spring of 2020.

24 As previously reported, the Parties anticipate that the results of the remedial  
 25 pilot study will be relevant to settlement discussion and therefore will, subject to the  
 26 availability of the mediator, schedule the second session mediation with Tim  
 27 Gallagher in early to mid-October. In the event of any further delay in completion of  
 28 the Pilot Study, Plaintiffs will advocate a return to mediation irrespective of the

1 availability of this information.

2 Plaintiffs are uncertain whether, based upon prior party positions, that a  
 3 satisfactory settlement will be achieved unless there is a dramatic change in the  
 4 position of the parties. Plaintiffs will participate in settlement discussions in good  
 5 faith, but expect that any resolution must be consistent with applicable legal  
 6 standards under the Comprehensive Environmental Response, Liability and  
 7 Compensation Act (42 U.S.C. §§ 9601, et seq.) and the Resource Conservation and  
 8 Recovery Act (42 U.S.C. §§ 6901, et seq.) (as pertains to the claims against Mr.  
 9 Shaikh in the companion action). Assuming settlement is not achieved, Plaintiffs  
 10 anticipate shortly thereafter requesting that the stay be lifted in the instant action so  
 11 that the Parties may return to litigation and seek alignment for scheduling and other  
 12 purposes between the two cases.

13 Dated: August 14, 2020

**RAINES FELDMAN LLP**

14  
 15 /s/ John S. Cha

16 John S. Cha

17 Counsel for Plaintiffs

18 Dated: August 14, 2020

**PILLSBURY WINTHROP SHAW  
 19 PITTMAN LLP**

20  
 21 /s/ Mark Elliott

22 Mark Elliott

23 Counsel for Plaintiffs

24 Dated: August 14, 2020

**PALADIN LAW GROUP® LLP**

25  
 26 /s/ Bret A. Stone

27 Bret A. Stone

28 Counsel for Defendants Pacifica Chemical,  
 Incorporated

1 Dated: August 14, 2020

**FOLEY & LARDNER LLP**

2  
3 /s/ Sarah A. Slack

4 Sarah A. Slack

5 Counsel for Plaintiff-Intervenor  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that on August 14, 2020, the foregoing document was electronically filed with the Clerk of the Court for the United States District Court, Central District of California, using the Court's Electronic Case Filing (ECF) system. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct.  
Executed on August 14, 2020.

By: /s/ AJ Cruickshank  
AJ Cruickshank